

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Judge Thomas J. Tucker

**CERTIFICATION OF NO RESPONSE OR OBJECTION
REGARDING CITY OF DETROIT’S AUGUST 2021 MOTION FOR
AUTHORITY TO MODIFY THE CONFIRMED PLAN OF ADJUSTMENT
TO REVISE THE “DROP” PROGRAM FOR CERTAIN POLICE
OFFICERS**

On August 31, 2021, the City of Detroit (“City”) filed its *August 2021 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the “DROP” Program for Certain Police Officers* (“Motion”). [Doc. No. 13433]. On the same date, the Motion was served upon all parties identified on the Certificates of Service attached as Exhibit A. *See Certificates of Service*, Exhibit A.

No response to the Motion has been filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Motion. *See Proposed Order*, Exhibit B. The proposed order attached as Exhibit B to this certificate of no response is in the same form as the proposed order which was attached to the Motion except that the City has added footnote 1 to the proposed order attached as Exhibit B to the certificate of no response, which provides that

“Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.”

Respectfully submitted,

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

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swansonm@millercanfield.com

Attorneys for the City of Detroit

DATED: September 21, 2021

Exhibit A

EXHIBIT 4 – CERTIFICATE OF SERVICE

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 31, 2021 he electronically filed the *City of Detroit's August 2021 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the "DROP" Program for Certain Police Officers* (the "Motion") with the Clerk of the Court which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this case. The City has engaged a Noticing Agent, which will serve the Motion on all parties identified on the Special Service List; the General Service List maintained by the Noticing Agent; and the presidents of the Detroit Police Command Officers Association, the Detroit Police and Lieutenant and Sergeants Association, and the Detroit Police Officers Association, and will file a subsequent Proof of Service after it has performed the service.

DATED: August 31, 2021

By: /s/ Marc N. Swanson

Marc N. Swanson

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

CERTIFICATE OF SERVICE

I, Lydia Do, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Debtor in the above-captioned case.

On August 31, 2021, at my direction and under my supervision, employees of KCC caused to be served the following document via Email on the service list attached hereto as **Exhibit A**; and via First Class Mail on the service list attached hereto as **Exhibit B**:

- **City of Detroit's August 2021 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the "Drop" Program for Certain Police Officers** [Docket No. 13433]

Dated: September 7, 2021

/s/ Lydia Do

Lydia Do

KCC

222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

Exhibit A

Exhibit A
GSL/SSL 2002 List
Served via Email

Description	CreditorName	CreditorNoticeName	Email
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Union Representative	AFSCME Local #0062	Attn: Lacydia Moore-Reese	Reesel@detroitmi.gov
Union Representative	AFSCME Local #0207	Attn: James Williams	afscme207@sbcglobal.net
Union Representative	AFSCME Local #0214	Attn: June Nickleberry	missnick64@hotmail.com
Union Representative	AFSCME Local #0229	Attn: Zachary Carr	afscmelocal229@gmail.com
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Counsel for Dexia Cr�dit Local, Dexia Holdings, Inc., Norddeutsche Landesbank Luxembourg, S.A., on behalf of Norddeutsche Landesbank Covered Finance Bank S.A. (collectively "Dexia") and Ad Hoc COPs Holders; and Panning Capital Management, LP, Monarch Alternative Capital LP, Bronze Gable, L.L.C. Aurelius Capital Management, LP, Stone Lion Capital Partners L.P.,	Allard & Fish PC	Deborah L Fish and Timothy R. Graves	dfish@allardfishpc.com; tgraves@allardfishpc.com
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Attorneys for the Investment Committee of the Police and Fire Retirement System	Bodman PLC	Noel J. Ravenscroft	nravenscroft@bodmanlaw.com
Attorneys for the Investment Committee of the Police and Fire Retirement System	Bodman PLC	Brian R Trumbauer	rmcdowell@bodmanlaw.com
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Interested Party	Chase Paymentech LLC	Attn Lazonia Clark Business Analyst	lazonia.clark@chasepaymentech.com

**Exhibit A
GSL/SSL 2002 List
Served via Email**

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Counsel for the Police and Fire Retirement System of the City of Detroit (the "PFRS") and the General Retirement System of the City of Detroit (the "GRS")	Clark Hill PLC	Shannon L Deeby	sdeeby@clarkhill.com
Counsel for International Union, UAW ("UAW")	Cohen Weiss and Simon LLP	Thomas N. Ciantra & Peter D. DeChiara and Joshua J. Ellison	pdechiara@cwsny.com; jellison@cwsny.com
Counsel for Waste Management Inc.	Couzens Lansky Fealk Ellis Roeder & Lazar PC	Attn: Jerry M Ellis	jerry.ellis@couzens.com
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**Exhibit A
GSL/SSL 2002 List
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Counsel for Community Foundation for Southeast Michigan; William Davidson Foundation; The Fred A. and Barbara M. Erb Family Foundation; Max M. and Marjorie S. Fisher Foundation; The Ford Foundation; Hudson-Webber Foundation; W.K. Kellogg Foundation; McGregor Fund; Charles Stewart Mott Foundation; and A. Paul and Carol C. Schaap Foundation (Collectively, the "Foundations")	Plunkett Cooney	Douglas C Bernstein	dbernstein@plunkettcooney.com
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Union Representative	Police Officers Labor Council	Attn: Jan Zaleski	presidentjan@aol.com
Counsel for Michael Beydoun	Raymond Guzall III PC	Raymond Guzall III	rayguzall@attorneyguzall.com
Attorneys for Creditors: Carlton Carter, Bobby Jones, Roderick Holley and Richard T. Weatherly	Resnick & Moss PC	H Nathan Resnick	hnresnick@resnicklaw.net; hnresnick@resnicklaw.com
Retiree Representative	Retired Detroit Police and Fire Fighters Association	Attn: Donald Taylor	rdpffa@hotmail.com
Counsel to Eric Kimbrough, Leinathian Jelks, Brandon Brooks, Phyllis Tharpe, Rodney Heard, Clenette Harris, Gregory Brazell, Jennifer Harris-Barnes, Henry Hassan, Melvin Miller, Terry Hardison, Velma, Denson, Raymond Thompson, Lucy Flowers, Brandon Gilbert, Brady Johnson, Quentin King, Sharon Pettway, Taralyn Smith, Donna Weatherspoon, Tarita Wilburn, Joseph Wright, Laverne Covington, James Matson, Kevin McGillivray, Rhonda Craig, Orlando Marion, John Collins, Terry Hardison, Carolyn Harp, Jeffrey Peterson, Clementine Stephens, Ezekiel Davis, Michael McKay, David Both, Raymond Thompson, Jr., Doug Taylor, Shumithia Baker, Floyd Brunson, Jerry Ashley, Anthony Harmon, Shelton Bell, Jr., Jeremiah Duren, Otis Evans, Wendy Jefferson, Gary Musser, Mario Littlejohn, Angela Davis, Jeffrey Theriot, Bernard White, Eddie Moore, Robert McGowen, Curtis Morris, Hondra Porter, Kevin McDonald, Jay Woods, Taesean Parnell, Yvette Spencer, Viena Lowe, Landon Banks, Darchella Lattnr, Nicholas Martin, Marily Cloyd, Robert Hall, Victoria Wilson, Theresa Chalch, Angela Davis, Jamie Jackson, Donald Harris, Winter Owens, Samiya Speed, Teran Brown, Antonio Brooks, Jermaine Gleen, Ray Lizzamore, Daniel Latanzio, Woodrow Roberson, Kevin Ivie, Darnell Fields, Daniel Soto, Kevin McGillivray, and Bradley Schick,	Romano Law PLLC	Attn Daniel G Romano & Trevor J. Zamborsky	dromano@romanolawpllc.com
Counsel for Official Retiree Committee	Salans FMC SNR Dentons Europe LLP	Claude Montgomery	claudemontgomery@Dentons.com
Contract Counterparty	SBS Financial Products Company, LLC	Attn. John Carter	jcarter@sbsco.com

Exhibit A
GSL/SSL 2002 List
Served via Email

Description	CreditorName	CreditorNoticeName	Email
Counsel for FMS Wertmanagement AöR	Schiff Hardin LLP	Frederick J. Sperling & Paul E. Greenwalt	fsperling@schiffhardin.com;
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Suzanne L Wahl	pgreenwalt@schiffhardin.com swahl@schiffhardin.com
Counsel for Schneiderman and Sherman PC; Attorney for U.S. Bank National Association as servicer for Michigan State Housing Development Authority; Flagstar Bank, FSB; Counsel for Kondaur Capital Corporation	Schneiderman & Sherman PC	Neil Sherman	NSherman@sspclegal.com
Union Representative	SEIU Local 517M	Attn: Yolanda Langston	langstony@gmail.com
Union Representative	Senior Water Systems Chemist Association	Attn: Andrew Ross	aross@dwsd.org
Counsel for The Kales Grand Circus Park LLC	Seyburn Kahn	David T Lin	dlin@seyburn.com
Fee Examiner	Shaw Fishman Glantz & Towbin LLC	Ira Bodenstein Gordon Gouveia David Doyle and Marc Reiser	ggouveia@shawfishman.com;
Counsel for Detroit Winsor Tunnell LLC	Sheldon S Toll PLLC	Sheldon S Toll	lawtoll@comcast.net
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Jeffrey Bjork, Esq. & Eric D. Tashman, Esq.	etashman@sidley.com;;
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Jeffrey E Bjork	jbork@sidley.com
Counsel for Retired Detroit Police and Fire Fighters Association ("RDPFFA"); 2) Donald Taylor, President of RDPFFA; 3) Detroit Retired City Employees Association ("DRCEA"); and 4) Shirley V. Lightsey, President of DRCEA	Silverman & Morris PLLC	Thomas R Morris and Karin F. Avery	morris@silvermanmorris.com
Counsel for Unisys Corporation	Sirlin Lesser & Benson PC	Dana S Plon	dplon@sirlinlaw.com
Counsel for Airgas USA LLC	Smith Katzenstein & Jenkins LLP	Kathleen M Miller	kmiller@skjlaw.com
State of Michigan Chief Legal Counsel	State of Michigan Chief Legal Counsel	Matthew Schneider	Schneiderm7@michigan.gov flanchers@michigan.gov;
State of Michigan Assistant Attorney General, Counsel to State of Michigan	State of Michigan Revenue & Collections Division	Steven B Flancher & Matther Schneider	schneiderm7@michigan.gov MIStateTreasurer@michigan.gov
The Office of the Treasurer for the State of Michigan	State Treasurer		
Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.; and Greenhill & Co LLC	Steinberg Shapiro & Clark	Mark H Shapiro	shapiro@steinbergshapiro.com
Counsel for Gabriel, Roeder, Smith & Company; Clark Associates, Inc.	Stevenson & Bullock PLC	Charles D Bullock Elliot G Crowder & Sean M Walsh	cbullock@sbplclaw.com; ecrowder@sbplclaw.com
Counsel for the Detroit Police Lieutenants and Sergeants Association	Sudnick Law PC	Peter P Sudnick	psudnick@sudnicklaw.com
Counsel for Syncora Guarantee Inc	Susheel Kirpalani Quinn Emanuel Urquhart & Sullivan, LLP		susheelkirpalani@quinnemanuel.com
Sylvia Jean Brown Jones, Pro Se	Sylvia Jean Brown Jones		bjdelta55@gmail.com
City's Secured & Unsecured Bonds	The Bank of New York Mellon Trust Company, National Association, as trustee	Attn: Eduardo Rodriguez	eduardo.rodriguez@bnymellon.com
Counsel for Derrez Payne	The Law Offices of Joumana Kayrouz, PLLC		mberkstein@joumanakayrouz.com
Counsel for Kevin Lewis & Jeremy Morris	The Markowitz Law Office	Carolyn B Markowitz PC	bankruptcy@markowitzlegal.com
Counsel for Michigan Auto Recovery Service Inc; Wayne County Circuit Court, Hyde Park Cooperative, et al. v. City of Detroit, by and through its Buildings and Safety Engineering Department, Case No. 10-005687-CZ	Thornbladh Legal Group PLLC	Kurt Thornbladh	kthornbladh@gmail.com; thornbladh.kurt3@gmail.com
Counsel for City of Detroit, Michigan	Togut Segal & Segal LLP	Attention: Albert Togut, Scott E. Ratner & Neil Berger	seratner@teamtogut.com; neilberger@teamtogut.com; dperson@teamtogut.com; ; dcahir@teamtogut.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan E. Jacobsen VP	susan.jacobsen2@usbank.com
Union Representative	UAW - Local # 412	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - Local #212	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW – PAA Local #2211	Attn: Robyn Brooks	BrooR@detroitmi.gov
Union Representative	UAW – WWTP Local #2200	Attn: Laurie Stuart	mimilaurie@yahoo.com;
Union Representative	Utility Workers Union of America	Attn: James Harrison	jharrison@uwua.net
Counsel for Center for Community Justice and Advocacy ("CCJA")	Vanessa G. Fluker, Esq., PLLC	Vanessa G Fluker	vgflawyer@sbcglobal.net
Interested Party	Vanguardians	Barry Allen	pra@vanguardians.org
Counsel for UBS AG and Merrill Lynch Capital Services Inc (COP Swap Counterparties)	Warner Norcross & Judd LLP	Douglas A Dozeman & Charles N Ash Jr	ddozeman@wnj.com;;cash@wnj.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Alfredo R Perez	alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.	gary.holtzer@weil.com;;alfredo.perez@weil.co m
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Kelly DiBlasi	kelly.dibiasi@weil.com
Counsel for Financial Guaranty Insurance Company	Williams Williams Rattner & Plunkett PC	Ernest J Essad Jr	ejessad@wwrplaw.com
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Attn: Lawrence A. Larose Samuel S. Kohn Carrie V. Hardman	chardman@winston.com swolfson@wolfsonbolton.com;
Counsel for The Bank of New York Mellon	Wolfson Bolton PLLC	Scott A Wolfson & Anthony J Kochis	akochis@wolfsonbolton.com
Counsel for International Association of Fire Fighters, AFL-CIO, CL	Woodley & McGillivray	Douglas L Steele	dis@wmlaborlaw.com

Exhibit B

Exhibit B
GSL/SSL 2002 List
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Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Union Representative	AFSCME Council #25	Attn: Catherine Phillips	600 W. Lafayette, Ste. 500			Detroit	MI	48226	
Union Representative	AFSCME Council #25	Attn: Albert Garrett	1034 N. Washington			Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Albert Garrett	600 W. Lafayette, Ste. 500			Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Ed McNeil	600 W. Lafayette, Ste. 500			Detroit	MI	48226	
Union Representative	AFSCME Local #0023	Attn: Robert Stokes	600 W. Lafayette, Ste. 134			Detroit	MI	48226	
Union Representative	AFSCME Local #0312	Attn: Phillip Douglas	14022 Linwood			Detroit	MI	48238	
Union Representative	AFSCME Local #0457	Attn: Laurie Walker	600 W. Lafayette, Ste. L - 104			Detroit	MI	48226	
Union Representative	AFSCME Local #1206	Attn: Arlene Kirby	20400 Steel			Detroit	MI	48235	
Union Representative	AFSCME Local #1220	Attn: Gerald Thompson	600 W. Lafayette, Ste. 136			Detroit	MI	48226	
Union Representative	AFSCME Local #1227	Attn: Joseph Walter	P.O. Box 36314			Grosse Pointe Farms	MI	48236	
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	600 W. Lafayette, Ste. L - 123			Detroit	MI	48226	
Counsel for Airgas USA LLC	Airgas USA LLC	Mr David Boyle	259 Radnor-Chester Rd Ste 100	PO Box 6675		Radnor	PA	19087-8675	
Union Representative	Assistant Supervisors of Street Maintenance & Construction Association	Attn: Herbert Jenkins	2633 Michigan Avenue			Detroit	MI	48216	
Union Representative	Association of Professional Construction Inspectors	Attn: Juanita Sanders	2727 Second Ave., Ste. 314B			Detroit	MI	48201	
Counsel for Detroit Branch NAACP, Michigan State Conference NAACP, Donnell White, individually and on behalf of Detroit Branch NAACP and Michigan State Conference NAACP, Thomas Stallworth III, individually, Rashida Tlaib, individually, and Maureen Taylor, individually, interested parties in this bankruptcy matter as it pertains to their civil suit in the Federal Eastern District Court of Michigan (Case Number 13-CV-12098)	Ayad Law PLLC	Nabih H Ayad	2200 Canton Ctr Rd Ste 220			Canton	MI	48187	
Counsel for Genuine Parts Company	Barack Ferrazzano Kirschbaum & Nagelberg LLP	Kimberly J Robinson	200 W Madison St Ste 3900			Chicago	IL	60606	
Counsel for Siemens Industry Inc.	Bowman and Brooke LLP		41000 Woodward Avenue, Suite 200 East			Bloomfields Hills	MI	48304	
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Brian E McGinty	150 W Jefferson Ste 100			Detroit	MI	48226	
Counsel for HP Enterprise Services LLC	Cole Schotz Meisel Forman & Leonard PA	Michael D Warner	301 Commerce St Ste 1700			Fort Worth	TX	76102	
Counsel for Kajj Development	David W Yaldo PC	David W. Yaldo	4036 Telegraph Road, Suite 204			Bloomfield Hills	MI	48302	
Counsel for T-Mobile USA, Inc	Dawda, Mann, Mulcahy & Sadler, PLC	Attn: Jessica B Allmand	39533 Woodward Ave Ste 200			Bloomfield Hills	MI	48304-5103	
Union Representative	Detroit Police Command Officers Association	Attn: Darrell Patterson	P.O. Box 02625			Detroit	MI	48202	
Union Representative	Detroit Police Lieut. & Sergeants Association	Attn: Mark Young	28 W. Adams, Ste. 700			Detroit	MI	48226	
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Felt	1301 Third St. Suite 329			Detroit	MI	48226	
Retiree Representative	Detroit Police Benefit and Protective Association	Attn: Delbert R. Jennings, Sr.	3031 W. Grand Boulevard, Suite 405			Detroit	MI	48202	
Union Representative	Detroit Police Officers Association	Attn: Craig Miller	1938 E. Jefferson			Detroit	MI	48207	
Retiree Representative	Detroit Retired City Employees Association	Attn: Shirley V. Lightsey	P.O. Box 40713			Detroit	MI	48240	
Counsel for U.S. Bank National Association (Top 20 Creditor)	Faegre Baker Daniels LLP	Attn: Abby E. Wilkinson, Esq.	2200 Wells Fargo Center	90 South Seventh Street		Minneapolis	MN	55402-3901	
Union Representative	Field Engineers Association	Attn: Larry Hart	PO Box 252805			West Bloomfield	MI	48325	
Counsel for U.S. Bank National Association (Top 20 Creditor)	Foster Swift Collins & Smith PC	Attn: John M. Kamins, Esq.	32300 Northwestern Hwy., Suite 230			Farmington Hills	MI	48334	
Counsel for the Bank of New York Mellon	Fulbright & Jaworski LLP	Melanie M Kotler	666 Fifth Ave			New York	NY	10103-3198	
Counsel for US Health & Life Insurance Company	Gold Lange & Majors PC	Sandra L Oconnor	24901 Northwestern Hwy Ste 444			Southfield	MI	48075	
The Office of the Governor of the State of Michigan	Governor Rick Snyder		P.O. Box 30013			Lansing	MI	48909	
Counsel for The Detroit Institute of Arts	Honigman Miller Schwartz and Cohn LLP	T. O'Reilly	600 Woodward Ave	2290 First National Bldg		Detroit	MI	48226	
Counsel for Defendants Greektown Casino and Detroit Entertainment LLC dba Motorcity Casino Hotel	Honigman Miller Schwartz and Cohn LLP	Jennifer Zbytowski Belveal	2290 First National Bldg	660 Woodward Ave		Detroit	MI	48226-3506	
Counsel for HP Enterprise Services LLC	HP Enterprises Services LLC	Ayala Hassell	5400 Legacy Dr			Piano	TX	75024	
Counsel for HP Enterprise Services LLC	HP Enterprises Services LLC	Ken Higman	12610 Park Plz Dr Ste 100			Cerritos	CA	90703	
Interested Party	IBM Corporation	Attn National Bankruptcy Coordinator	275 Viger East Ste 400			Montreal	QC	H2X 3R7	Canada
Counsel for IBM Credit LLC	IBM Credit LLC	Andy Gravina	Special Handling Group MD NC317	6303 Barfield Rd NE		Atlanta	GA	30328	
Counsel for International Union, UAW ("UAW")	International Union, UAW	Michael Nicholson	8000 E Jefferson Ave			Detroit	MI	48214	
Counsel for Michigan Bell Telephone Company dba AT&T Michigan	Katten Muchin Rosenman LLP	Paige E Barr	525 W Monroe Ste 1900			Chicago	IL	60661	
Counsel for St Martins Cooperative	Law Offices of Lee & Correll	Michael K Lee	24901 Northwestern Hwy Ste 113			Southfield	MI	48075	
Counsel for the Retired Detroit Police and Fire Fighters Association; Donald Taylor; Shirley V Lightsey; and Detroit Retired City Employees Association	Lippitt O Keefe PLLC	Att Ryan C Plecha	370 E Maple Rd 3rd Fl			Birmingham	MI	48009	
Counsel for FK Park, LLC and FK South, LLC	Maddin, Hauser, Roth & Heller, P.C.	Ian S Bolton	28400 Northwestern Hwy 2nd Fl			Southfield	MI	48034	
Counsel for Synhora Guarantee Inc	Manlese Honigman Rossman and Williamson PC	Brendan Frey	1361 E. Big Beaver Road			Troy	MI	48083	
Counsel for Bishop Real Estate, L.L.C.	McDonald Hopkins PLC	Jason L Weiner	39533 Woodward Ave Ste 318			Bloomfield Hills	MI	48304	
Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	McKnight McCow Canzano Smith & Radtke PC	John R Canzano	400 Galleria Officecentre Ste 117			Southfield	MI	48034	
Pro se	Nathaniel Brent		538 S Livernois			Detroit	MI	48209	
Office of the United States Trustee	Office of the United States Trustee	Daniel McDermott	211 West Fort Street Suite 700			Detroit	MI	48226	
Union Representative	Police Officers Labor Council	Attn: Marvin Hansberry	518 Inkster Road			Dearborn Heights	MI	48127	

Exhibit B
GSL/SSL 2002 List
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Counsel for CitiMortgage, Inc.	Potestivo & Associates PC	Mary Atallah	251 Diversion St			Rochester	MI	48307	
Interested Party	Primeshares World Markets, LLC		261 5th Ave 22nd Fl			New York	NY	10016	
Counsel enters an appearance for The Bank of New York Mellon (successor by operation of law to The Bank of New York), as custodian of the Police and Fire Retirement System of the City of Detroit Fund and as custodian of the General Retirement System of the City of Detroit Fund									
Interested Party	Reed Smith LLP	Amy M Tonti	225 Fifth Ave			Pittsburgh	PA	15222	
Counsel for Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman ("Flowers plaintiffs"); and Detroit Police Command Officers Association ("DPCOA"); Detroit Fire Fighters Association, I.A.F.F. Local 344	Ricoh USA Inc	Recovery & Bankruptcy Group	3920 Arkwright Rd Ste 400			Macon	GA	31210	
Union Representative	Sachs Waldman PC	Mary Ellen Gurewitz	2211 E Jefferson Ave Ste 200			Detroit	MI	48207	
Counsel for Ambac Assurance Corporation	Sanitary, Chemists & Technicians Association	Attn: Saulius Simoliunas	2727 Second Ave. Rm. 314 - D			Detroit	MI	48201	
Counsel for DEPFA Bank PLC	Schafer and Weiner PLLC	Brendan G Best	40950 Woodward Ave Ste 100			Bloomfield Hills	MI	48304	
SEC	Schiff Hardin LLP	Rick L Frimmer & Matthew W Ott	233 S Wacker Dr Ste 6600			Chicago	IL	60606	
Union Representative	Securities & Exchange Commission	Bankruptcy Section	175 W Jackson Blvd	Suite 900		Chicago	IL	60604-2815	
Counsel for 415 East Congress, LLC; Attorney for Creditor K & P, Incorporated; H.D.V. Greentown, LLC	Senior Accountants, Analysts & Appraisers Association	Attn: Audrey Bellamy	65 Cadillac Square, Ste. 2905			Detroit	MI	48226	
Counsel for National Public Finance Guarantee Corporation	Shafer & Associates PC	Matthew J Hoffer	3800 Capital City Blvd Ste 2			Lansing	MI	48906	
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Guy S Neal	1501 K St NW			Washington	DC	20005	
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn James F Bendernagel	1501 K St NW			Washington	DC	20005	
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Guy S. Neal, Esq.	1501 K Street, N.W.			Washington	DC	20005	
Union Representative	Teamsters Local #214	Attn: Joseph Valenti	2825 Trumbull Avenue			Detroit	MI	48216	
Counsel for Public Lighting Authority	The Allen Law Group, P.C.	Attn: Ron Liscombe, Esq.	3011 West Grand Boulevard	2500 Fisher Building		Detroit	MI	48202	
Corporation Counsel for the City of Detroit	The City of Detroit	Attn: Corporation Counsel	Coleman A. Young Municipal Center	2 Woodward Avenue	Fifth Floor	Detroit	MI	48226	
The City, c/o the Emergency Manager	The City of Detroit	Attn: Kevyn D. Orr, Emergency Manager	Coleman A. Young Municipal Center	2 Woodward Ave Suite 1126		Detroit	MI	48226	
Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	The Sanders Law Firm PC	Herbert A Sander	615 Griswold St Ste 913			Detroit	MI	48226	
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan T. Brown	Senior Vice President and Manager	535 Griswold Ste 550		Detroit	MI	48226	
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water Bonds)	U.S. Bank National Association, as trustee, for the Detroit Sewer and Water Bonds	Attn: Lawrence J. Bell	PD-OR-P6TD			Portland	OR	97204	
Union Representative	United Auto Workers Union	Attn: Michael Nicholson	800 E Jefferson Ave			Detroit	MI	48214	
Counsel for United States of America	Unites States Attorney	Julia A. Caroff, Assitant US Attorney	211 W Fort St Ste 2001			Detroit	MI	48226	
Union Representative	Utility Workers Union of America Local #488	Attn: Carl Anderson	19315 Westmoreland			Detroit	MI	48219	
Union Representative	Utility Workers Union of America Local #504	Attn: Curlisa Jones	5405 Railview Ct. - Apt. 166			Shelby Township	MI	48316	
Union Representative	Utility Workers Union of America Local #531	Attn: Samuel Wilson	5274 Nottingham Rd.			Detroit	MI	48224	
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Sarah T. Foss	1111 Louisiana 25th Fl			Houston	TX	77002-5242	

Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**[PROPOSED] ORDER GRANTING CITY OF DETROIT’S
AUGUST 2021 MOTION FOR AUTHORITY TO MODIFY THE
CONFIRMED PLAN OF ADJUSTMENT TO REVISE THE
“DROP” PROGRAM FOR CERTAIN POLICE OFFICERS**

This matter, having come before the court on the *City of Detroit’s August 2021 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the “DROP” Program for Certain Police Officers (“Motion”)*¹; and the Court having jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII of the Plan; and due and proper notice of the Motion having been given as provided in the Motion; and it appearing that no other or further notice of the Motion need be given; and a hearing on the Motion having been held before the Court; and any objections or other responses to the Motion having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the Motion and at the hearing establish just cause for the relief granted; and the Court being fully advised in the premises; and there being good cause to grant the relief requested,

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.

THE COURT ORDERS THAT:

1. The Motion is granted as set forth herein.
2. The City may amend paragraph (3) of section 12.1 of the New PFRS

Active Pension Plan with language that is substantially similar to the following:

(3) Notwithstanding paragraph 2 of this section or any other provision of this Plan, a member of the Detroit Police Lieutenants and Sergeants Association shall be entitled to participate in the DROP program under the Component I for the maximum of ten (10) years. At the end of such ten (10) year period of participation in the DROP program, the member shall be retired and separated from employment. **If, however, at the time of the scheduled DROP retirement date, the Chief of Police determines that the skill set or value of the member who is retiring would result in a hardship on department needs or operations, the Chief of Police after mutual agreement with the member may grant an extension of the retirement date in one year increments not to exceed an additional five (5) years for a total of fifteen (15) total years in the DROP. A member granted this extension shall continue to be subject to the below listed criteria.**

A member who is participating in the DROP program pursuant to this paragraph §12.1(3) or pursuant to Component II of the Police and Fire Retirement System must be able to perform the essential functions of a police officer, assigned for the duration of his or her participation in the DROP program. Provided, however, that if a member, while participating in the DROP program pursuant to this paragraph §12.1(3) or Component II of the Police and Fire Retirement System requires and is granted restricted duty for 365 consecutive days or more, that member may be retired and separated from employment after the end of such granted time period if the member is

unable to perform the essential functions of a police officer.

While participating in the DROP program pursuant to paragraph §12.1(3) or pursuant to Component II of the Police and Fire Retirement System, a member of the Detroit Police Lieutenants and Sergeants Association must receive bi-annual satisfactory performance evaluations according to the performance evaluation standards then in place for sworn officers. Any such member who receives an unsatisfactory performance evaluation shall be entitled to the appeals process then in place, as well as final review by the Chief of Police. If a member receives a second unsatisfactory evaluation, that member may be retired and separated from employment. Additionally, if a participating member receives consecutive adjudicated findings of misconduct, that member may be retired and separated from employment subject to an appeal and final review of the Chief of Police.

3. Nothing in this Order is intended to constitute, will constitute, or may be deemed as constituting the City's consent under section 904 of the Bankruptcy Code to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.

4. The Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.